

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:19-CV-767-ECM
)	
HYUNDAI MOTOR MANUFACTURING,)	
ALABAMA, LLC; HYUNDAI ENG)	
AMERICA, INC.; and DYNAMIC)	
SECURITY, INC.)	
)	
)	
Defendants.)	

EXHIBIT E TO

**PLAINTIFF'S OBJECTIONS TO HYUNDAI MOTOR MANUFACTURING,
ALABAMA, LLC'S DEPOSITION DESIGNATIONS**

SHERRY SPIRES

Case	Key, Davita
Issue Code	HMMA Designation

SPIERS, SHERRY 8/19/22 VOL 1			
1	018:06 - 018:06	018:06	MS. BROWN: Object to the form.
2	018:19 - 018:20	018:19 20	MS. BROWN: Object to form. MR. MILLER: Object to form.
3	021:15 - 021:16	021:15 16	MS. BROWN: Object to form. MR. MILLER: Object to the form.
4	025:17 - 025:19	025:17 18 19	MR. REDMOND: Same objection. MS. BROWN: Object to the form. MR. MILLER: Object to the form.
5	038:08 - 038:10	038:08 09 10	MR. MILLER: Object to form. MS. BROWN: Object to form. MR. REDMOND: Same object to form.
6	075:22 - 076:17	075:22 23 076:01 02 03 04 05 06 07 08 09 10 11 12 13 14 15 16 17	Q. Okay. Are you aware of the existence of an entity called Hyundai Engineering America or Hyundai ENG America? A. That has been -- that was brought up in preparing for this, that there were actually two different -- but in my -- my world, I only knew Hyundai. Q. You just knew the one word Hyundai? A. Yes. Q. You're not -- it didn't come up directly here. Do you know which entity Cassandra Williams works for? A. No. Q. If she -- if there's a sworn declaration in evidence where she says that she works exclusively for Hyundai Engineering America, would you have any basis to dispute that? A. No.
7	078:05 - 079:18	078:05 06 07 08 09	Q. And in Exhibit 38, in your e-mail at the bottom of Page 73, you write, "Let's make sure there is a clear written policy from HMMA dot, dot, dot." At the time you wrote that e-mail,

		<p>10 were you aware of the existence of Hyundai ENG</p> <p>11 America?</p> <p>12 A. No. I would've just used HMMA just</p> <p>13 because someone else -- I saw someone else</p> <p>14 using the acronym for it rather than typing out</p> <p>15 Hyundai. That's the only reason I would have</p> <p>16 used that.</p> <p>17 Q. And then with respect to the policy</p> <p>18 that Ms. Robinson writes or rewrites or types</p> <p>19 in response to your e-mail, Ms. Robinson never</p> <p>20 expressly says that this is HMMA's policy, does</p> <p>21 she?</p> <p>22 A. No. I don't see it on this e-mail.</p> <p>23 Q. And, in fact, she describes it as</p> <p>079:01 this is an excerpt from something that's posted</p> <p>02 on a bulletin board; correct?</p> <p>03 A. Correct.</p> <p>04 Q. And so sitting here today as</p> <p>05 Dynamic's representative, you have no idea who</p> <p>06 posted that policy; correct?</p> <p>07 A. Correct.</p> <p>08 Q. Do you know of anyone, other than</p> <p>09 Cassandra Williams, who requested that Ms. Key</p> <p>10 not return to the Hyundai facility?</p> <p>11 MR. MILLER: Object to the form.</p> <p>12 A. I know of no one else other than</p> <p>13 Cassandra.</p> <p>14 Q. Have you ever personally seen any</p> <p>15 policy regarding hair style that is clearly</p> <p>16 coming from Hyundai Motor Manufacturing</p> <p>17 Alabama?</p> <p>18 A. No.</p>
8	080:08 - 081:03	<p>080:08 Q. Sorry. Do you have any basis -- is</p> <p>09 there any document evidence that would support</p> <p>10 any conclusion that HMMA is a direct client of</p> <p>11 Dynamic Security?</p> <p>12 A. I'm unsure how to answer that</p> <p>13 because --</p> <p>14 Q. It's outside your scope?</p> <p>15 A. -- the difference. Yes. And the</p> <p>16 difference in the two companies --</p> <p>17 Q. Is unknown to you?</p>

		<p>18 A. -- with me -- right. It was just</p> <p>19 Hyundai. I -- it never occurred to me that</p> <p>20 there were two different entities.</p> <p>21 Q. So as far as your knowledge goes,</p> <p>22 Hyundai Engineering or Hyundai ENG America</p> <p>23 might be Dynamic's client --</p> <p>081:01 A. Right.</p> <p>02 Q. -- and not HMMA?</p> <p>03 A. At the time, yes. That's --</p>
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